

1 Richard M. Heimann (State Bar No. 63607)
2 Kelly M. Dermody (State Bar No. 171716)
3 Brendan P. Glackin (State Bar No. 199643)
4 Dean M. Harvey (State Bar No. 250298)
5 Anne B. Shaver (State Bar No. 255928)
6 LIEFF, CABRASER, HEIMANN & BERNSTEIN, LLP
7 275 Battery Street, 29th Floor
8 San Francisco, CA 94111-3339
9 Telephone: (415) 956-1000
10 Facsimile: (415) 956-1008

11 Joseph R. Saveri (State Bar No. 130064)
12 James G. Dallal (State Bar No. 277826)
13 JOSEPH SAVERI LAW FIRM, INC.
14 505 Montgomery, Suite 625
15 San Francisco, CA 94111
16 Telephone: (415) 500-6800
17 Facsimile (415) 395-9940

18 Co-Lead Class Counsel

19 UNITED STATES DISTRICT COURT
20 NORTHERN DISTRICT OF CALIFORNIA
21 SAN JOSE DIVISION

22 IN RE: HIGH-TECH EMPLOYEE
23 ANTITRUST LITIGATION

24 THIS DOCUMENTS RELATES TO:
25 ALL ACTIONS

Master Docket No. 11-CV-2509-LHK

**DECLARATION OF JAMES J. SABELLA
IN SUPPORT OF PLAINTIFFS'
MOTION FOR ATTORNEYS' FEES,
REIMBURSEMENT OF EXPENSES,
AND INCENTIVE AWARDS**

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3 I, James J. Sabella, declare:

4 1. I am an attorney licensed to practice in the States of New York and Delaware. I
5 am a director of Grant & Eisenhofer P.A. ("G&E"), Counsel for the Class Representatives and for
6 the proposed Settlement Class. I have personal knowledge of the facts set forth herein and could
7 competently testify to them if called as a witness.

8 2. G&E is one of the largest and most respected plaintiffs' class action firms in the
9 nation. Over the past six years, the firm has obtained recoveries totaling over \$12.5 billion for
10 plaintiffs in cases in which the firm served as lead or co-lead counsel.

11 3. G&E attorneys and legal assistants have spent considerable time on the litigation
12 of this action. G&E's contemporaneous billing records for all personnel with at least 10 hours on
13 the case are attached hereto as Attachment 1, and a summary of the time for each person is
14 attached hereto as Attachment 2. Total time by such G&E personnel comes to 2,488.70 hours
15 which, at current billing rates, amounts to \$1,429,225.50 in time charges.

16 4. To advance this litigation, G&E paid certain costs totaling \$178,623.71 through
17 May 5, 2015. Those costs consisted of contributions to the joint litigation fund of Class Counsel
18 ("Litigation Fund") as well as costs paid separately by G&E, as set forth below. To date, G&E
19 has been reimbursed \$177,623.71, so that the total amount of unreimbursed costs amounts to
20 \$1,100.23.

21 5. The Litigation Fund was designed to pay common external costs, such as expert
22 fees, court reporting expenses for deposition transcripts, and vendor fees for our electronic
23 platform for review and storage of documents produced in the course of discovery. G&E
24 contributed \$140,000 to the Litigation Fund as of May 5, 2015. Further details regarding the
25 Litigation Fund are described in the accompanying Declaration of Kelly M. Dermody.

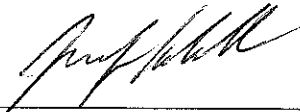
26 6. In addition, G&E paid separately 38,723.94 for certain costs that were not paid for
27 by the Litigation Fund, including copying documents, travel, electronic computer research,
28 faxing, and mailing charges, printing, telephone services, and other expenses. These expenses are

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3 summarized in a chart attached hereto as Attachment 3, and detailed invoices are attached hereto
4 as Attachment 4.

5 7. G&E incurred the time and costs described herein on behalf of Plaintiffs on a
6 contingent basis, and has not been reimbursed except as set forth above. The records of this time
7 and these costs are reflected in G&E's books and records. I have reviewed the time and expenses
8 reported by G&E in this case that are included in this motion and I affirm that they are true and
9 accurate.

10 * * * *

11 I declare under penalty of perjury under the laws of the United States and the State of New
12 York that the foregoing is true and correct to the best of my knowledge and that this declaration
13 was executed in New York, NY on May 7, 2015.

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17 James J. Sabella
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